

NECHELES LAW LLP

ATTORNEYS AT LAW

535 5TH AVENUE, 4TH FLOOR
NEW YORK, N.Y. 10017
TELEPHONE: (212) 997-7400
TELECOPIER: (212) 997-7646

March 24, 2021


Via ECF

Hon. Ronnie Abrams
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Application granted. The status conference is adjourned to June 25, 2021 at 11:00 a.m. Time is excluded until June 25, 2021, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A).

SO ORDERED.

Re: *United States v. Yoel Abraham, et al*, 20-cr-411 (RA)



Ronnie Abrams, U.S.D.J.
March 24, 2021

Dear Judge Abrams:

We write on behalf of all defendants, and with the consent of the government, to respectfully request an adjournment of tomorrow's status conference for 90 days.

Discovery in this case is ongoing and it is voluminous. The additional time requested will allow time for the government to make an additional sizable production to the defendants and allow time for the defendants to review that new discovery.

All defendants consent to the exclusion of time under the Speedy Trial Act both to allow time to review discovery and for the defense to confer with the U.S. Attorney's Office.

AUSA Jilan Kamal consents to this motion.

Respectfully submitted,

/s/
Gedalia M. Stern

cc: All attorneys (via ECF)